

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
	)	
v.	)	No. 1:21-cr-10256-RWZ
	)	
KINGSLEY R. CHIN,	)	
ADITYA HUMAD, and	)	
SPINEFRONTIER, INC.,	)	
	)	
Defendants	)	

**JOINT STATUS REPORT**

The parties hereby file the following status report in anticipation of the status conference scheduled for May 16, 2023.

**1. Automatic Discovery and Discovery Requests**

The government provided automatic discovery to the defendants on October 29, 2021, and made supplemental discovery productions on December 10, 2021, January 10, 2022, February 17, 2022, and June 15, 2022.

Counsel for the defendants submitted discovery requests to the government on February 28, 2023 and submitted follow up requests on April 3, 2023. *See* Dkt. Nos. 95, 96, 99. The government has provided written responses to those requests. In those responses, the government has committed to production of further discovery materials, and has objected to certain other requests. The government produced materials responsive to the defendant's requests on March 21, 2023 and anticipates producing additional discovery material.

**2. Discovery Motions**

The defendants are continuing to review the government's recent discovery responses and productions and anticipate requiring additional time to review forthcoming discovery. Based on the government's written responses, the defendants anticipate filing and reserve the right to file discovery motions.

**3. Protective Orders**

The Court has entered a protective order in this matter. *See* Dkt. No. 37.

**4. Pretrial Motions**

The defendants have not filed any pretrial motions under Fed. R. Crim. P. 12(b).

**5. Expert Discovery**

The parties agree that deadlines for expert disclosures should be established at a later date.

**6. Defenses of Insanity, Public Authority, or Alibi**

None of the defendants presently intends to assert a defense of insanity, public authority, or alibi.

**7. Speedy Trial Act**

All time has been excluded under the Speedy Trial Act from the date of the defendants' arraignments through May 16, 2023. The parties request that the time be excluded from May 16, 2023 until the next conference or hearing in this matter.

**8. Status of Plea Discussions and Likelihood of Trial**

None of the defendants has expressed an intention to plead guilty. The parties estimate that a trial in this matter would last three to five weeks.

**9. Next Status Conference**

In light of the foregoing, including the open discovery issues that the parties continue to address with each other, the defendants request that the Court continue the status conference set for May 16, 2023 to a date not earlier than June 19, 2023. The government does not oppose that request.

Respectfully submitted,

KINGSLEY R. CHIN

By his attorneys,

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Dated: May 10, 2023

UNITED STATES OF AMERICA,

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